

**United States Department of State
Bureau of Political-Military Affairs
Directorate of Defense Trade Controls
Office of Defense Trade Controls Compliance**

Helpful Hints on Preparing a Complete Registration Package & Submitting Material Changes to Registration

Updated September 2006

HELPFUL HINTS

A. SUBMITTING A COMPLETE REGISTRATION PACKAGE

The Office of Defense Trade Controls Compliance (DTCC) is posting this list of helpful hints to help improve the quality of registration submissions and to reduce review times.

What is considered a complete registration package for a new or renewal submission?

❖ A complete registration package includes:

- Form DS-2032 (Statement of registration);
- Transmittal Letter;
- Documentation of incorporation or other authorization to do business in the United States;
- Fees prescribed in Section 122.3(a); and
- It must be signed by a senior officer, who also qualifies as an empowered official per Section 120.25.

❖ A renewal package requires ALL of the same documentation as an initial submission. However (pursuant to ITAR Section 122.3(b)), it MUST be received by DTCC 30 days BEFORE expiration. We would recommend, however, that packages be submitted and received by this office at least 60 days prior to the expiration date to further reduce the chance that your registration expires and consequently lose your ability to export or use ITAR exemptions until your registration review is completed by DDTC.

What are some helpful hints to ensure that the submission is complete?

Answering the following questions should help you submit a complete package (Note: this is a list of information commonly left out and does not cover every block of the form DS-2032)

_____ Have you put a response in every block? For example, if Block #2 and/or Blocks # 9 – 12 do not apply to your company, enter “N/A.”

_____ (Block # 1) Have you included your company name and address and **included telephone number and fax number where DTCC may contact you?**

_____ (Block # 2) If submitting a registration request for the first time, enter “N/A” in this block.

_____ (Block #2) If submitting a renewal, enter your existing registration number.

_____ (Block # 3) Circle the correct number of years (1 or 2) and check to make sure the listed dollar amount matches correctly (1 year \$1,750 or 2 years \$3,500).

_____ Write the check or money order to the Department of State **for the correct amount in U.S. currency** as specified in Block #3 (1 year \$1,750 or 2 years \$3,500) and which is also payable through a U.S. financial institution.

_____ (Block # 5) You may register as a manufacturer, exporter of hardware/technical data and exporter of defense services under one complete registration package. To register as Broker as defined in ITAR Part 129 requires a separate, complete registration package (including fee).

_____ (Block # 6) Have you attached your official Government authorization to do business in the U.S. (or equivalent for foreign brokers) and reflected the place and date of incorporation in this block? Acceptable documents include:

- Your State Incorporation Certificate;
- State Certificate of Good Standing;
- State, County, or City Business License; or
- State Articles of Incorporation (include only the pages with your firm’s name and official State Seal).

Note to Manufacturers/Exporters of **Category 1 defense articles:**

Remember to include a copy of your current Federal Firearms License (FFL) issued by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) of the Department of Justice.

_____ (Block #7) Information on Directors, Officers, Partners, and Owners must include the:

- **Full last and first names** and middle initials (**do not abbreviate first names and if no middle initial insert N/A**);

- **Position** (e.g., President, Chief Executive Officer, Chief Financial Officer reflected in the articles of incorporation, partnership or joint venture agreement);
- **Foreign** Directors and Owners citizenship must be specifically identified. If living in the United States, provide permanent residency documentation and visa information, as applicable, as an additional attachment;
- Place of birth should include **city, state, and country**;
- **Social Security #** (If not provided **may take longer** to process);
- **Home Address** (Must be a physical street address. You may add a mailing address, but it cannot be a substitute for the physical address);
- **Citizenship** (if U.S. citizen please enter “U.S.”).

_____ (Block # 8) Review the U.S. Munitions List (USML) categories that are applicable to your business (see ITAR Category 121). **A USML category must be entered with a description of the articles and/or services.** If working as a subcontractor and you don’t know the purchasing government agency, please enter “N/A.”

_____ (Blocks # 9 -10) List all wholly- and partially-owned U.S. or Foreign subsidiaries (to include joint ventures) that manufacture, export, and/or broker USML articles, technical data or services.

_____ (Block # 11) Before submitting the registration package double check whether your U.S. parent company, if applicable, is registered. If so, your company should be listed on the parent company’s registration. If not, the registration should be submitted under the parent company. If there is no parent company, enter N/A.

_____ (Block # 12) If a company is ultimately owned and/or controlled by foreign persons, then the associated transmittal letter must reflect this fact. The submission must include details on the degree of ownership and control by the foreign persons and reflect the ultimate owner. Control is defined and established not only by percentage of ownership. It also is established when one or more foreign persons have the authority or ability to establish or direct the general policies or day-to-day operations of the firm. (Reference ITAR Section 122.2(c)).

- _____ For Block # 14, ensure the Registration Form **DS-2032** and **transmittal letter are signed by a senior officer listed in Block #7, who qualifies as empowered official as defined in ITAR Section 120.25.**

B. SUBMITTING MATERIAL CHANGES (Officers, Company Name & Address). Make sure they are submitted:

- _____ In required time-frames (60 days for foreign ownership and control and 5 days for other material changes)
- _____ On Company Letterhead
- _____ Listing your current registration number
- _____ With a revised Transmittal Letter and signed by a senior officer of the company, who qualifies as an empowered official (per ITAR Section 120.25) (an individual listed in Block #7 on DS-2032 form)
- _____ With the current date
- _____ With all legal documentation as attachments supporting the material change. For example:

Ineligibility Changes (5-days):

Documentation such as indictment, letter of suspension or debarment, conviction.

Officer/Director Changes (5-days):

Documentation to include all detail on the individual being added that would be included in Block #7 of the Form 2032. Revise transmittal letter to reflect eligibility of persons added and include as attachment.

Company Name & Address Changes (5-days):

Changes need to be submitted on your new company letterhead. Include documentation supporting the change, such as a business license or articles of incorporation, plus a new federal firearms license (as applicable).

Domestic Acquisitions/Divestitures (5-days):

Specify type of transaction and whether the registrant is the buyer or seller. Identify all parties to be involved, licenses to be moved from one registrant code to another, any senior officer changes, for example.

Foreign Acquisitions/Divestitures (60-days):

Specify type of transactions and whether the registrant is the buyer or seller. Identify all parties to be involved, any changes in registrant structure or senior officers. Need specific details on changes to current registrant ownership and control by specific individuals or companies, their authorities or abilities to establish or direct the general policies or day-to-day operations of the registrant. Recommend including current compliance structure from senior officer to empowered officials, where located, who they report to, and current compliance program. Other information may be requested to review the transaction per ITAR Section 122.4(b).

Mailing Your Registration Form

Postal and Express Mailing Address and Courier Delivery Service

U.S. Department of State
Directorate of Defense Trade Controls
Compliance & Registration Division
2401 E Street NW, SA-1, Room H1200
Washington, DC 20522-0112

(Until the form is updated, this mailing information supercedes that provided on the DS-2032 instructions page.)

General Questions on Registration?

Please call the Registration Team at (202) 663-2815, (202) 663-2813, or (202) 663-2986. Fax – (202) 261-8695